

MONTGOMERY MCCrackEN WALKER & RHOADS LLP

(A Limited Liability Partnership Formed in Pennsylvania)

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Attorneys for the Praxair Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

<p>AGNES LAWSON, et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>PRAXAIR, INC., et al.,</p> <p>Defendants.</p> <hr/> <p>PRAXAIR DISTRIBUTION, INC., et al.,</p> <p>Defendants/Third-Party Plaintiffs,</p> <p>v.</p> <p>PRINCETON HEALTHCARE SYSTEM HOLDING, INC., et al.,</p> <p>Third-Party Defendants.</p>	<p>Civil Action No.: 3:16-cv-2435-BRM-DEA</p>
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**THE PRAXAIR DEFENDANTS' NOTICE OF MOTION
APPEALING FROM THE DISCOVERY MASTER'S RECOMMENDATIONS
DATED MARCH 19, 2020**

TO: All Counsel of Record

PLEASE TAKE NOTICE that on June 15, 2020, at 9:00 a.m. or as soon thereafter as counsel may be heard, the Praxair Defendants through their undersigned attorneys, appeal from the Rulings of the Discovery Master dated March 19, 2020, and shall move before the Honorable

Brian R. Martinotti, U.S.D.J., at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order requiring Third-Party Defendant University Medical Center of Princeton at Plainsboro (“UMCPP”) to produce all documents that were either redacted or withheld based on the New Jersey Patient Safety Act within 10 days, reallocating the costs associated with the Discovery Master’s *in camera* review to UMCPP and requiring UMCPP to pay all of Praxair’s fees and costs incurred in pursuing this issue concerning the New Jersey Patient Safety Act.

PLEASE TAKE FURTHER NOTICE that the Praxair Defendants do not request oral argument in connection with this motion unless opposition papers are filed.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is being submitted herewith.

MONTGOMERY, McCRACKEN,
WALKER & RHOADS, LLP

Dated: May 15, 2020

By: s/Georgette Castner

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CERTIFICATE OF SERVICE

I, Georgette Castner, hereby certify that on this date, the foregoing Praxair Defendants' Notice of Motion Appealing from the Discovery Master's Recommendations dated March 19, 2020, Brief in support, Certification of Georgette Castner, Esq., with exhibits, and proposed form of Order have been served via the Court's CM/ECF system to all counsel of record.

Dated: May 15, 2020

s/Georgette Castner

Georgette Castner